



Environmental Integrity & Excellence

Hong Kong Institute of Qualified Environmental Professionals Limited (HKIQEP)  
香港合資格環保專業人員學會有限公司 (香港環專會)

## **Public Engagement on Control of Single-Use Plastics**

The Hong Kong Institute of Qualified Environmental Professionals Limited (HKIQEP) welcomes the public engagement on Control of Single-Use Plastics by the Council for Sustainable Development on behalf of the Government of Hong Kong Special Administrative Region (Government). We would like to provide our comments and suggestions from an environmental professional perspective and urge the Government to finalize the strategy as soon as possible to tackle this major environmental issue.

### **Single-Use Plastics as a Major Environmental Issue**

Hong Kong disposed of about 2,300 tonnes of plastic wastes every day in 2019 and most of them were generated from the use of single-use plastic products. These plastic wastes are harmful not only to our local environment, but also posing a great challenge to the global marine ecology, human health, climate change and many other aspects.

Single-use plastic products, such as packaging materials, plastic shopping bags, umbrella bags, festival celebration products and toiletries provided by hotels, are creating significant adverse impacts on our environment and sustainability because they are rapidly discarded after brief use and difficult to be recycled. Due to their light weight and positive buoyancy, many single-use plastic products float and spread widely across the sea. They will further break apart easily into tiny pieces known as “microplastics” that are difficult to remove from the marine environment. In addition, they can find their way into the bodies of marine species and, eventually, our food chain, thereby threatening our health.

The Government should implement a comprehensive and effective control programme to control single-use plastic products as soon as possible



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### Products to be Controlled

The HKIQEP considers that all hard-to-recycle single-use plastic products, except those for essential uses, e.g., medical, life-saving and health purposes, should be banned. A banning schedule with priority to those which:

- (i) have successful banning experience overseas;
- (ii) are particularly problematic in causing adverse environmental impacts;
- (iii) are non-essential, unnecessary or without much demonstrated need;
- (iv) have available sustainable alternatives.

should be established and implemented as soon as possible by the Government with a view to banning these products within 3 years.

Furthermore, the HKIQEP supports the banning of oxo-degradable plastic products. Due to their inability to truly biodegrade and their contribution to micro-plastic pollution, these products are extremely problematic. Therefore, multiple countries and international bodies including but not limited to the European Union, Canada and Australia have already implemented policies to phase out oxo-degradable plastic products. Thus, the HKIQEP advocates the prohibition of products containing oxo-degradable plastic in Hong Kong.

Prior to the completion of the product banning, the Government should consider taking all other regulatory measures, including levy charging on single-use plastic products, limiting the use of virgin plastics as raw materials, mandatory labelling of the virgin and recycled plastic contents. In addition, the Government should also introduce regulatory measures to prohibit unnecessary or excessive plastic packaging, including those used in local logistic and on-line shopping.



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### Enhancing the Existing Plastic Shopping Bag Charging Scheme

While the achievement of the Plastic Shopping Bag (PSB) Charging Scheme is commendable, it is evident that there are still plenty of rooms for enhancement in view of that about 4 billion PSBs were still being used and disposed of in 2019. There is a need for the Government to strengthen the control to ensure no PSB will be used and wasted, other than for genuine health and hygiene reasons.

The current charge of HK\$0.5 for each PSB, which was set in 2009 and has not been adjusted since then, is no longer sufficient to discourage the public from using and wasting PSB. To be more effective in reducing PSB consumption, the Government should increase the charge significantly to a level that is no lenient than any of other overseas economies.

The HKIQEP considers that most of the exemptions provided under the existing PSB Charging Scheme are not necessary and may, to certain extent, be misused as an excuse for over-packaging. It is not appropriate to further exempt those PSBs carrying frozen/chilled foodstuff in airtight packaging as well as those foodstuffs already fully wrapped by non-airtight packaging as well as those for carrying foodstuff not fully wrapped by any packaging (e.g. bread sold at bakeries, fruits sold at wet market)

### Education and Knowledge Sharing

Education and awareness are essential elements in making behavioural changes. The HKIQEP agrees that there is an urgent need for developing a platform for sharing information alternatives among different stakeholders and educating the public. In addition, it is also important for the Government to let the public fully informed of the downstream costs and perverse outcomes of using single-use plastics products to our environment, economy and society.

On the other hand, as many people are concerned about the potential health impacts of stopping the use of disposable and single-use plastic items, it would be necessary for the Government to provide correct and relevant information to help address these negative perceptions.

The HKIQEP also agrees that more information on the recyclability and percentage of recycled content of a single-use plastic product is provided by the manufacturer would



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be helpful for consumers to make an informed purchase decision. It would be appropriate for the Government to consider introducing a statutory labelling system to require the disclosure of these information.

### Other Issues

One of the reasons that single-use plastics are so commonly used is their comparatively cheap price. To ensure fair competition and adherence to the Polluters Pay Principle, the Government should consider imposing a plastic levy on single-use plastic products in favour of those sustainable alternatives. In view of the big challenges involved in transitioning away from single-use plastics, the Government should also consider providing incentives and other supports to help producers to develop and promote sustainable alternatives.

The HKIQEP agrees that waste management should be based on the hierarchy of prevention, and reusing, reducing consumption and recycling residual waste into beneficial products. However, the strategic role of adequate waste treatment and recycling services should not be undermined in the pursuit of the effective and successful single-use plastics programme. The HKIQEP urges the Government to ensure sufficient waste treatment and recycling capacity to treat and recycle the plastic wastes generated in an environmentally acceptable without interruption.

### Response Form

Appended please find HKIQEP's completed Response Form.



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## Annex III - Views Collection Form

Which of the following capacity are you using to respond to this views collection form?

<input checked="" type="checkbox"/> Professional Bodies / Institutions	<input type="checkbox"/> Public Organisations	<input type="checkbox"/> Green Groups
<input type="checkbox"/> Industry Associations	<input type="checkbox"/> Companies	<input type="checkbox"/> Others
Name of Organisations / Companies: <u>The Hong Kong Institute of Qualified Environmental Professional Limited</u>		
<input type="checkbox"/> Individuals		

Email Address: \_\_\_\_\_

Question (1): How concerned are you about each of the following issues with single-use plastics?

Answer:

Issues	Extent of concern (1 - Not concern, 5 - very concern)					Don't know
	1	2	3	4	5	
Single-use plastics are littered in the natural environment, which causes pollution and harm to wildlife	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Use of single-use plastics increases carbon footprint and poses climate change hazard.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Single-use plastics are difficult to recycle and take up valuable landfill space.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The society's over-reliance on single-use plastics promotes a wasteful culture.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



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Question (2): What types of product should be put under control? For those that should be controlled, should actions be taken in short-term (within 3 years) or medium-term (3 – 5 years)? What should be the approach for controlling them?

[Remark to readers: for more examples on single-use plastic product, please refer to p.7 of this public engagement document]

**Answer:**

Single-use plastic product	Need to control					No need to control
	Short-term / medium-term action? (Please ✓)		Approach (Please ✓) (Can choose more than one option)			
	Short-term	Medium-term	Total ban	Regulatory measure	Voluntary measure	
<b>Local product packaging</b> e.g. box for containing fruit / eggs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Local retail packaging</b> e.g. foam tray and platter for fresh fruit, meat, fish or poultry	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Local packaging for logistics and online shopping</b> , e.g. plastic wrap and bubble wrap	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Festival and celebration products</b> , e.g. inflatable cheer stick, glow stick, cutlery, stirrer, straw and plate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Toiletries distributed by hotels</b> , e.g. showering product in small bottle	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Others, including</b> - umbrella bag	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- supplementary tool sold together with a product for its usage / consumption, such as plastic straw attached to a paper beverage carton	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- other toiletries like plastic stemmed cotton buds	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- miscellaneous items such as signage for meetings, conventions and exhibitions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- others (please specify _____)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



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## Annex III - Views Collection Form

Question (3): Enhancing existing measure - the Plastic Shopping Bag Charging Scheme

(3.1): Do you agree that the current exemption for Plastic Shopping Bag (PSB) carrying frozen/ chilled foodstuff in airtight packaging can be removed?

Answer:

Yes

No

(3.2): Do you agree that foodstuff already fully wrapped by non-airtight packaging should not be provided with free PSB?

Answer:

Yes

No

(3.3): Do you agree only ONE PSB should be exempted for carrying foodstuff not fully wrapped by any packaging (e.g. bread sold at bakeries, fruits sold at wet market)?

Answer:

Yes, I agree only ONE exempted PSB is needed.

No, we should not limit the number of exempted PSB to be provided.

No, I consider \_\_\_\_ (please specify the number) exempted PSBs should be provided.

(3.4): What is the minimum charging level that can discourage you from using a PSB (HKD)?

Answer:

\$1

\$1.5

\$2

others: \_\_\_\_  
(please specify)

Question (4): Do you agree that, if more information on the recyclability and percentage of recycled content of a single-use plastic product is provided by the manufacturer, it would be helpful for consumers to make an informed purchase decision?

Answer:

Yes

No





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Question (5): Do you agree there is a need to develop a platform for sharing information on plastic alternatives among different stakeholders (including businesses, material suppliers and consumers)?

**Answer:**

Yes

No

Question (6): When there are different brands available for the same type of merchandise. Which of the following green considerations would affect your choice?

**Answer:** Please refer to the comments made in the paragraph on "Type of Products to be Controlled"

Considerations	Would it affect your choice				
	Strongly affected	Slightly affected	Not very affecte	Not at all affected	Can't say/ don't know
Whether the product can be re-used (e.g. reusable metal cutlery vs single-use plastic cutlery for parties, reusable umbrella bags vs disposable umbrella bags)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Whether "green material" is used (e.g. products and packaging with recycled content)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The brand's "corporate environmental responsibility" (e.g. the brand offers "take-back" service for the collection and subsequent recycling of their products)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Whether the product is not over-packaged	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question (7): One of the reasons that plastics are so commonly used is their comparatively cheap price. Replacing plastics by non-plastic / reusable alternatives may drive up the costs of the products. To reduce the use of single-use plastics, are you willing to pay more? If yes, assuming that a single-use plastic item costs \$10, how much are you willing to pay for the same product made from non-plastic / reusable alternatives?

**Answer:** Please refer to the comments made in the paragraph on "Other Issues".

<input type="checkbox"/> less than \$0.5 (i.e. less than 5% of product price)	<input type="checkbox"/> \$0.5 – 1 (i.e. 5 – 10% of product price)	<input type="checkbox"/> \$1.1 – 1.5 (i.e. 11 – 15% of product price)	<input type="checkbox"/> more than \$1.5 (i.e. more than 15% of product price)
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